



September 12, 2016

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: Ex Parte Presentation, Improving Wireless Emergency Alerts and
Community-Initiated Alerting, PS Docket No. 15-91.**

Dear Ms. Dortch,

In response to recent discussions with staff of the Commission's Public Safety and Homeland Security Bureau, CTIA would like to take this opportunity to discuss key parameters and enhancements to the Wireless Emergency Alert ("WEA") service in the above-referenced proceeding. WEA continues to be an important bell ringer consumer service that the wireless industry has endeavored to rapidly deploy and enhance. The current framework that is the hallmark of WEA has greatly contributed to the success of this voluntary program. If the Commission elects to adopt new rules as it seeks to update and upgrade the WEA service, CTIA strongly urges that such rules be tailored to encourage a continued successful voluntary private/public partnership with government stakeholders.

Fundamentally, CTIA believes that it is crucial that changes to the WEA service are carefully developed and deployed to ensure that consumer experiences and expectations are properly managed. The wireless industry is concerned that excessive modifications to WEA may lead to confusion by the public or may overwhelm wireless subscribers with either confusing or duplicative information. This may have the unintended effect of subscribers choosing to opt out of the service. In this regard, it is vitally important that FEMA, DHS, and the FCC work collaboratively together to describe the responsibilities for WEA messaging moving forward and these requirements be precisely discussed and defined in any Commission decision to enhance the WEA service, including approximate timeline goals for National Center for Missing and Exploited Children readiness as well as FEMA readiness (as the Alert Administrator),



where appropriate. Any compliance deadlines should be based upon technical feasibility and provide for sufficient time for standards development, testing, deployment, consumer market penetration, and, where relevant, the corresponding capabilities of the FEMA gateway and alert originator software. Such requirements should also factor in timing for handset turnover and should, in general, be targets rather than rigid deadlines.

Additionally, current international wireless standards efforts are almost exclusively focused on next generation (5G) requirements and parameters. As a result, any WEA enhancements will be difficult to move through standards bodies. Industry's prior experience of a 12 month process for standards completion is likely to be substantially longer, perhaps closer to 24 months. Handset replacement rates also have slowed in recent years, with some third parties estimating that the replacement cycle has stretched to 29 months in 2016, up from 24 months in the late 2013/2014 timeframe according to a recent Wall Street Journal article.¹ Thus, market penetration of new WEA features into the existing handset base is therefore likely to be delayed by the slowing handset replacement cycle. There will be no "compatibility upgrade" path for legacy digital and LTE devices: only LTE-capable wireless devices that have been newly developed for enhanced WEA messages will be capable of receiving such messages.

In light of these realities, CTIA provides the following input on specific areas that the Commission is investigating in relation to possible enhancements to WEA service:

- *Time for Compliance.* The timeline (starting from the effective date of any final rule changes for WEA) for supporting 360 character messaging, participation in a "Public Safety Message" service, new localized WEA testing and support of multilingual alerts should be as follows:
 - 24 months for standards completion;
 - 18 months for device and network development;
 - 12 months to begin transmitting 360 character WEAs to capable devices; and
 - Limiting all WEAs to 360 characters is unnecessary, but any such restriction would require at least 48 months after standards completion and device and network development for handset turnover and market penetration.

¹ See <http://www.wsj.com/articles/americans-keep-their-cellphones-longer-1461007321>



- *Embedded References.* In addition, CTIA believes that a voluntary pilot program for managing embedded references within a WEA message would be required. Current WEA messaging has no connection between a browser and the WEA interface, so there is no ability within existing standards to accommodate a “clickable” link. As the use of embedded references will lead to the potential for network congestion and/or customer confusion, a pilot period will be necessary to make certain this capability is fully functional. Furthermore, a voluntary pilot program cannot be initiated until there are actual LTE-capable devices to participate in the trial – which means that such testing should not be started until after standards completion and device development. Any compliance timeline should be established only *after* results are made available from – and informed by – this voluntary pilot program. For those companies that choose to not engage in the envisioned pilot program, CTIA urges the Commission to establish a formal process to allow other WEA participants to track progress and assess findings. CTIA encourages the Commission to create ample opportunity for other WEA participants to examine the results of the pilot and offer formal feedback before moving forward with any codified requirement to embed references.
- *Geo-targeting.* For enhanced geo-targeting, CTIA believes that the 60-day compliance requirement suggested in the NPRM is achievable if the CSRIC IV best approximate definition approach is utilized.²
- *Logging and Retention of WEA Data.* Commercial Mobile Service (“CMS”) Provider Alert Gateways should only be required to maintain archived logs for a three (3) month period, rather than the 36 month time suggested by the Commission NPRM. WEA alert data should only be relevant for a short period of time and is most likely to be retrieved by a Local alert originator conducting tests immediately, but almost certainly within three months. Thus, there is no cognizable reason to oblige CMS Providers to store such information longer than necessary.
- *Alert Prioritization.* CTIA recommends that CMS Providers’ Alert Gateways continue to process alerts on a “as soon as received” prioritization.

² See https://transition.fcc.gov/pshs/advisory/csric4/CSRIC_CMAS_Geo-Target_Msg_Content_Msg_Len_Rpt_Final.pdf



- *Message Classification.* CTIA recommends that the FCC insert language in its Order to make clear that any new classification requirement would be supported by newly manufactured handset models only and not apply to legacy handsets in the marketplace.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Brian M. Josef

Assistant Vice President – Regulatory Affairs
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